

POSTAL RATE AND FEE CHANGES, 2000

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

INTERROGATORY FROM UNITED PARCEL SERVICE TO  
MAGAZINE PUBLISHERS OF AMERICA, INC., ET AL.  
WITNESS CROWDER, MPA-T-5  
(UPS/MPA-T5-1 through 3)  
(June 19, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby  
files and serves the following interrogatories directed to Magazine Publishers of  
America, Inc., et al., witness Crowder: UPS/MPA-T5-1 through 3.

Respectfully submitted,



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Of Counsel.

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UPS/MPA-T5-1. (a) Confirm that your evaluation of Mr. Raymond's work is performed in comparison to the Postal Service's 1986 Street Time Survey (STS). That is, if the Commission follows your advice to "reject the use of the ES data for ratemaking purposes" (MPA-T-5, page 5), the only alternative will be to use the 1986 STS data in its place. (b) Confirm that the 1986 STS data do not necessarily accurately represent BY1998 city carrier costs, nor is it necessarily more accurate than ES.

UPS/MPA-T5-2. At page 6 of your testimony (MPA-T-5, page 6), you state that "Mr. Raymond's work sampling study was not designed for ratemaking costing purposes and was conducted prior to any thought that it be used in ratemaking. While this, standing alone, does not automatically invalidate use of the data for costing, it does raise a warning flag." (footnote omitted)

(a) Are you aware of any other Postal Service data systems that were not designed for ratemaking costing purposes but are used for those purposes? If so, identify them.

(b) Are you aware that data from the Management Operations Data System (MODS) was not designed for "ratemaking costing purposes?"

(c) Witness Bradley (USPS-T-18) makes use of the Highway Contract Support System (HCSS) for costing purposes. He describes the database as "an electronic database system to manage [the Postal Service's] purchased highway

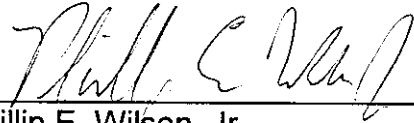
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transportation contracts." USPS-T-18, at page 12. Would you agree that this system was not "designed for ratemaking costing purposes?"

UPS/MPA-T5-3. At page 20 of your testimony, in reference to the Postal Service's selection of cities and routes to include in activity samplings, you state that "Although [ad hoc sampling] may be appropriate for industrial engineering projects, it does not meet ratemaking costing standards . . . ." Is it your testimony that the data that are used to create workload standards are or can be of lower quality than data that are used for "ratemaking costing"?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

A handwritten signature in cursive script, appearing to read "Phillip E. Wilson, Jr.", written over a horizontal line.

Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: June 19, 2000  
Philadelphia, Pa.